UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICATION NO.	FILING DATE	FIRST NAMED INVENTOR	ATTORNEY DOCKET NO.	CONFIRMATION NO.
09/133,741	08/13/1998	DAVID ROBERT BALDWIN	TD-143	6925

29106   7590   11/02/2004

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EXAMINER
NGUYEN, THU V

ART UNIT	PAPER NUMBER
3661	

DATE MAILED: 11/02/2004

Please find below and/or attached an Office communication concerning this application or proceeding.

PTO-90C (Rev. 10/03)

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09/133,741			

EXAMINER

ART UNIT	PAPER

102804

DATE MAILED:

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Commissioner for Patents

The reply brief filed on August 12, 2004 has been entered and considered. The application has been forwarded to the Board of Patent Appeals and Interferences for decision on the appeal.

THU V. NGUYEN
PRIMARY EXAMINER

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: :
Baldwin : Art Unit: 3661
AN 09/133,741 : Examiner: Thu Nguyen
Filed: 08/13/1998 : Atty's Docket: TD-143
For: Improved Triangle Clipping for 3D Graphics (confirmation no. 6925)

REPLY BRIEF

Honorable Commissioner of Patents and Trademarks
Alexandria, VA 22313

reply brief noted nto 10/28/04

Sir:

Enclosed is a reply brief for the above application. Four complete copies are included, three bound and one unbound. The reply brief is being filed in response to the Examiner's Answer mailed on 07/14/2004.

Any fee necessary for consideration of this paper has been authorized to be charged to Deposit Account Number 07-2320.

Respectfully submitted,

[signature]

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12 AUGUST 2004

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: :

Baldwin   :   Art Unit: 3661

AN 09/133,741   :   Examiner: Thu Nguyen

Filed: 08/13/1998   :   Atty's Docket: TD-143

For: Improved Triangle Clipping for 3D Graphics (confirmation no. 6925)

REPLY BRIEF

Honorable Commissioner of Patents and Trademarks
Alexandria, VA 22313

Sir:

Appellant respectfully submits the following Reply to the new arguments presented in Examiner Nguyen's Answer mailed 07/14/2004.

RESPONSE TO NEW ARGUMENTS

In her response to the appeal brief filed on 04/14/2003, Examiner Nguyen raises the following new arguments:

1. Examiner Nguyen has suggested that *Rossin* uses only one memory device 304 to store both the input and output vertices of a primitive. However, this ignores the fact that *Rossin* still requires an additional memory device 306 inorder to perform the clipping process. Without memory device 306, *Rossin* would not be able to clip an input primitive.

The innovations of the present application do not require a second memory device. The present inventions are able to clip an input primitive using just one single circular buffer. This feature is claimed, for example, as follows:

Claim 1: "performing a clipping algorithm which uses only a single circular buffer to store input and output vertices of a primitive";

Claim 16: "circuitry to implement a clipping algorithm which uses only a single circular buffer to store input and output vertices of a primitive"; and

Claim 48: "wherein said geometry unit uses only a single circular buffer to store input and output vertices of said primitive".

Therefore, even if one were motivated to replace memory device 304 of *Rossin* with a circular buffer as suggested by Examiner Nguyen, it still would not result in the present inventions. The teachings of *Rossin* would still require a secondary buffer.

2. Examiner Nguyen also has suggested that the ability of shifting vertices from the input list location to the output list location suggests a circular buffer. However, Applicant respectfully disagrees with this suggestion.

A circular buffer refers to an area of memory used to store a continuous stream of data by starting again at the beginning of the buffer after reaching the end. A circular buffer is usually written by one process and read by another. Separate read and write pointers are maintained.

Memory device 304 of *Rossin* does not maintain separate read and write pointers. Instead, *Rossin* moves the data from location to another by physically copying the data from location to another. This is actually characteristic of a non-circular buffer.

A prima facie case of obviousness is established when the teachings of the prior art itself suggest the claimed subject matter to a person of ordinary skill in the art. *In re Bell*, 991 F.2d 781, 783, 26 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1993). *Rossin* does not suggest a circular buffer. Hence, there is no suggestion to combine.

REQUESTED RELIEF

The Board is respectfully requested to reverse the outstanding rejections.

Respectfully submitted,

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